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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Advanced Television Systems)
and Their Impact Upon the)
Existing Television Broadcast)
Service)

MM Docket No. 87-268

To: The Commission

COMMENTS OF THE ADVANCED TELEVISION SYSTEMS COMMITTEE
ON BROADCASTERS' PETITION
FOR CLARIFICATION AND PARTIAL RECONSIDERATION
OF THE FIFTH AND SIXTH REPORTS AND ORDERS

I. Introduction

The Advanced Television Systems Committee ("ATSC") hereby offers the following brief comments on the Petition for Clarification and Partial Reconsideration of the Commission's Fifth Report and Order and Sixth Report and Order submitted by a large group of broadcasters in the above-captioned docket.¹ The Broadcasters' petition is submitted by

¹ Petition for Clarification and Partial Reconsideration of the Fifth and Sixth Reports and Orders submitted by the Association for Maximum Service Television, Inc., the Broadcasters Caucus, and Other Broadcasters, MM Docket No. 87-268, June 13, 1997, pp. 45, 47.

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MSTV, the Broadcasters Caucus of ATSC, and other broadcasters, and among other things, urges the Commission 1) to replace the emission mask specified in the Sixth Report and Order with the weighting methodology soon to be recommended by the ATSC; and 2) to take affirmative steps to acknowledge and support the ongoing inter-industry activity aimed at developing a DTV channel labeling scheme.

II. Weighted Emission Mask

The ATSC strongly supports the Broadcasters' call to replace the RF emission mask specified in the Sixth Report and Order with the weighting function approach nearing completion in the ATSC. The ATSC's weighting function-based spectral distribution for DTV transmitters will provide greater protection of adjacent NTSC channels than will the spectral distribution that would result from the Commission's fixed emission mask currently specified in the Order. The ATSC approach is based on interference data taken at the Advanced Television Test Center. Emissions that conform to the ATSC specification will meet the threshold of visibility interference levels that were established by the test data.

Moreover, terrain and transmitting antenna effects are inherently included in the definition of the ATSC weighting function methodology, because the ATSC metric is the ratio of DTV-to-NTSC power (average DTV power and peak-of-sync NTSC power) as measured anywhere in the coverage area claimed for the NTSC station that is receiving new "interference" from an adjacent DTV station. In addition, the ATSC specification also defines in-band requirements for the DTV signal in order to meet DTV coverage assumptions.

Work on the ATSC emission mask specification is essentially complete, and it has been forwarded by the specialist group that developed it to the full ATSC Technology Group on Distribution (T3) where it will be discussed and voted upon in a meeting scheduled for July 23. Assuming T3 approves the specification, it will be submitted by letter ballot to the full membership of ATSC, with final approval likely to occur well before the Commission rules on the reconsideration petitions before it. Once the ATSC has adopted its emission mask specification, we will submit it to the Commission, and we strongly urge the Commission to adopt it in place of the fixed mask currently specified in the Order.

III. Channel Labeling

The ATSC shares the concern expressed in the Broadcasters' petition regarding the critical importance of developing an effective DTV channel labeling scheme in a timely fashion. The ATSC Specialist Group on Transport Systems Documentation (T3/S8) has been exploring the issue of Naming, Numbering and Navigating (N³) the digital television channels since February of this year. The objective has been to develop solutions that will satisfy the diverse requirements of broadcasters, cable television systems, and consumer electronics manufacturers while providing a user-friendly environment for the consumer. Participants in the work of T3/S8 have included individual broadcasters and the National Association of Broadcasters, cable TV programmers and equipment manufacturers, consumer electronics manufacturers and the Consumer Electronics Manufacturers Association, and other interested parties.

At its most recent meeting on July 15, 1997, T3/S8 considered a draft document that proposes a solution that appears to satisfy the relevant requirements and that harmonizes the

N³ environment for terrestrial broadcast and cable TV services. This document will be circulated to the members of the parent ATSC Technology Group on Distribution (T3) at its July 23, 1997 meeting, and to the Digital Video Subcommittee of the Society of Cable and Telecommunications Engineers (SCTE) at its July 24, 1997 meeting. Work on this document is expected to be completed by the end of August so that it can be balloted to the full ATSC membership in September.

Following final approval of this proposal by the ATSC members, we will submit the document to the Commission, and as we indicated in our comments on the Sixth NPRM in this proceeding,² we will also recommend to the Commission the extent to which we believe the DTV channel labeling scheme included therein can be implemented as part of a voluntary industry standard as opposed to being embodied in the Commission's rules. We continue to believe that the Commission should monitor the work of the ATSC in this area and evaluate whether our recommendation fully meets the public's needs.

IV. Conclusion

Accordingly, the Commission should replace the fixed emission mask specified in the Sixth Report and Order with the weighting methodology soon to be recommended by the ATSC, and should continue to acknowledge and support the inter-industry activity aimed at developing a DTV channel labeling scheme which is now nearing completion in the ATSC.

² Reply Comments of the Advanced Television Systems Committee, Sixth Further Notice of Proposed Rule Making, MM Docket No. 87-268, January 24, 1997, pp. 4-5.

Respectfully submitted,

A handwritten signature in black ink that reads "Robert K. Graves". The signature is fluid and cursive, with the first name and last name clearly legible.

Robert K. Graves
Chairman

A handwritten signature in black ink that reads "Craig K. Tanner". The signature is fluid and cursive, with the first name and last name clearly legible.

Craig K. Tanner
Executive Director

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Certificate of Service

I, Christy Kehlbeck, hereby certify that on this 18th day of July, 1997, I have forwarded by U.S. mail a copy of the foregoing Comments on Broadcasters' Petition for Clarification and Partial Reconsideration of the Commission's Fifth and Sixth Reports and Orders to the following parties:

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